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**UNITED STATES DISTRICT COURT  
 FOR THE DISTRICT OF OREGON**

**ANN SAMUELSON,**

**Plaintiff,**

**vs.**

**STEVE PHILLIPS, in his individual and  
 Representative capacity, RON BROWN, in  
 his individual and representative capacity,  
 ERIC DOTSON, in both his individual  
 and representative capacity, CHANCE MOORE,  
 , in both individual and representative capacity,  
 TOM BERGIN, in both individual and  
 representative capacity, SHANNON WOOD in  
 her individual and representative capacity,  
 CONNIE McCLEARY in her individual and  
 Representative capacity, JOHN and JANE DOE,  
 1-10,  
 Defendants.**

**Civil Action No.:**

**COMPLAINT:**

**42 USC 1983**

**Malicious Prosecution**

**Abuse of Process**

**Witness Tampering**

**Intentional Infliction of Mental**

**Anguish, RICO Violations,**

**Negligent Training and Oversight**

**INTRODUCTION:**

This matter emerges as a result of false accusations of witness tampering in a case when Plaintiff's husband was a victim of Malicious Prosecution for sexual assault and/or harassment asserted by defendant Shannon Wood, in a retaliatory effort to divert attention from her

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1 inappropriate behavior which was indicative of an extra-marital affair with a man who also  
2 served on the School Board for defendant Jewell School District 8.

3 Plaintiff's husband had become aware of a parental concern of what appeared to be the  
4 inappropriate sexual misconduct of defendant Shannon Wood, as relayed from the parent of one  
5 of the student players for the basketball/volleyball team at Jewell School District 8, where both  
6 the Plaintiff and defendant Shannon Wood were coaches. It was reported to the Plaintiff that the  
7 parent's concern was that Shannon Wood's behavior regarding her relationship with the father of  
8 a volleyball player on the team she was assistant coaching was sexual in nature. The parent  
9 reported all the students were talking about it. Plaintiff promptly contacted Superintendent Steve  
10 Phillips, informing him of the parental concern so that the school could address the matter in an  
11 appropriate manner.  
12

13  
14 As opposed to maintaining the confidence of the reported misconduct, defendant Steve  
15 Phillips apprised defendant Shannon Wood of the Plaintiff's comments. While the school took  
16 no action towards Shannon Wood for her misconduct, within a relatively short period of time  
17 thereafter, Plaintiff's husband was terminated from his job as coach of the boys' basketball team,  
18 and despite the fact that protocol was not followed, as there was no complaint filed with the  
19 EEOC, DA Ron Brown, who is a political rival and whom has a well-publicized vendetta against  
20 the Plaintiff, criminally charged her husband with ten (10) misdemeanor counts of sexual  
21 harassment or some variation thereof, although there was no evidence supporting these charges.  
22 The Clatsop County DA Brown offered to drop the investigation threatening to charge Plaintiff  
23 with witness tampering if Plaintiff's husband would pay a fee settlement of \$20,000, as  
24 demanded by Plaintiff's husband's accuser, Shannon Wood. At this time Plaintiff was of the  
25  
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27

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1 belief that she was still under investigation, as she only found out in December of 2021 that the  
2 investigation had been dropped one month after its inception, but that the Clatsop County DA  
3 had continued to use this threat as leverage in the Plaintiff's husband's case.

4 Although eventually, these false charges were dropped, the Plaintiff's character and reputation  
5 were tarnished beyond recognition in the community where she and her husband have spent their  
6 entire lives. The ordeal caused the Plaintiff great emotional distress, and she was diagnosed with  
7 PTSD as a result. She also suffered a substantial loss of income and standing in the community.  
8

9  
10 **JURISDICTION:**

- 11 1. This matter is premised on 28 USC 1343(a)(3), 42 USC 1981, 42 USC 1983, 18  
12 USC 1961, et seq., and this Court's pendant and ancillary jurisdiction to entertain  
13 state law-based claims in conjunction with causes of action premised on federal  
14 law consistent with **Smith v. Kansas City Title & Trust**, 155 U.S. 180 (1920).  
15

16 **VENUE:**

- 17 2. Venue is premised upon 28 USC 1391(b)(2), et seq.

18 **PARTIES:**

- 19 3. Plaintiff, Ann Samuelson, is a resident of Clatsop County, Oregon and citizen of  
20 the United States of America.  
21  
22 4. Defendant Steve Phillips, is, upon information and belief, a resident of the State  
23 of Oregon and can be served with the Summons and Complaint on his person  
24 wherever he can be located within the State of Oregon.  
25  
26 5. Defendant Ron Brown, is, upon information and belief, a resident of Clatsop  
27 County, Oregon and presently serves as the duly elected District Attorney for

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Clatsop County who can be served with the Summons and Complaint at his offices or any other place where he may be found within the State of Oregon.

6. Defendant Eric Dotson, is, upon information and belief, a resident of Clatsop County, Oregon and serves as a Deputy Sheriff for Clatsop County who can be served with the Summons and Complaint at his residence, place of work or any other place that she can be found within the State of Oregon.
7. Defendant Chance Moore, is, upon information and belief, a resident of Clatsop County, Oregon and serves as a Deputy Sheriff for Clatsop County, Oregon. This defendant may be served with the Summons and Complaint at his place of employment or wherever he may be found within the State of Oregon.
8. Defendant Tom Bergin, is, upon information and belief, a resident of Clatsop County, Oregon and previously served as Sheriff for Clatsop County, Oregon. This defendant may be served with the Summons and Complaint at his place of employment, or wherever he may be found within the State of Oregon.
9. Defendant Shannon Wood, is, upon information and belief, a citizen of the United States of America and previously served as an employee of Jewell School District in Clatsop County, Oregon, who can be served with the Summons and Complaint upon her person wherever she may be found within the State of Oregon.
10. Defendant Connie McCleary is upon information and belief, a resident of Clatsop County, Oregon and also was an employee of Clatsop County, who can be served with the Summons and Complaint upon her person wherever she can be found within the State of Oregon.

1 11. Defendants John and Jane Doe 1-15 are sued in a fictitious capacity as their  
2 identity is not yet known to Plaintiff but upon a determination of their true  
3 identities, Plaintiff will supplement and amend his pleadings to reflect same.  
4

5 **COMMON NUCLEUS OF OPERATIVE FACT:**

6 12. Plaintiff's husband was informed by the parent of one of the student athletes at  
7 Jewell School that defendant Shannon Wood was engaged in a sexual,  
8 extramarital relationship with Brian Meier (a former member of defendant Jewell  
9 School Board).  
10

11 13. Consistent with his obligation as a member of the Jewell School District coaching  
12 staff and a former member of the School District Board, he reported this  
13 information to the Superintendent of the School District, defendant Steve Phillips  
14 in what was thought to be a confidential disclosure consistent with the provisions  
15 of ORS 339.372, et seq.  
16

17 14. Within a matter of 48 hours or less, defendant Shannon Wood texted Plaintiff's  
18 husband and asked if he had spoken to the Superintendent, defendant Steve  
19 Phillips,  
20

21 15. Plaintiff's husband responded in the affirmative and shortly thereafter was fired  
22 and indicted by the defendants in the Clatsop County DA's office and the  
23 Sheriff's office.  
24

25 16. Multiple parents, co-workers and others with whom Wood had been in contact in  
26 the past came forward with descriptions of her pattern of filing false claims as a  
27 form of retaliation and attention-seeking. Another employee against whom Wood  
28

1 had attempted to get fired won an appeal with the TSPC (Oregon Teacher  
2 Standards and Practices Commission.)

3 17. Wood did not bother to file a claim with the EEOC, which is the rule required for  
4 any allegation of sexual harassment.

5 18. Shannon Wood requested a Protection Order against Plaintiff's husband, and on  
6 September 27, 2019 Judge Paula Brownhill denied it, citing that there was no  
7 evidence or factual basis to support Wood's claim.

8 19. This should have collaterally estopped Woods from pursuing further action  
9 against Plaintiff's husband.

10 20. Shannon Wood pushed the issue with the local District Attorney, Ron Brown,  
11 who was a former political adversary of the Plaintiff.

12 21. Brown's antipathy for the Plaintiff was so well-known that Deputy Chief  
13 Halverson had in the past requested that a case involving a Samuelson family  
14 member be sent to the Department of Justice due to concern that Ron Brown, who  
15 is the head District Attorney for Clatsop County would not be impartial in any  
16 matter involving the Samuelson family, and in fact might use his position to  
17 possibly retaliate against Plaintiff.

18 22. Ron Brown indeed escalated the case from a sexual harassment in the workplace  
19 to a criminal case and stacked unsubstantiated charges.

20 23. After the interaction with Clatsop County Sheriff Deputies, defendants Chance  
21 Moore, and Eric Dotson, Plaintiff's husband was given a citation by the deputies  
22 and then subsequently charged with ten (10) counts of sexual harassment and  
23

1 related misconduct flowing directly from the false allegations made against him  
2 by defendant Shannon Wood

3  
4 24. The charging parties had personal vendettas against the family due to votes by the  
5 Samuelson family when they were members of the Jewell community such as  
6 Dave Samuelson speaking out against the hiring of Steve Phillips who had been  
7 discharged for misconduct by another entity, and Plaintiff, as the Clatsop  
8 County Commissioner, and when Plaintiff had voted against a Stipend for the  
9 DA's office because the DA had not kept proper paperwork.

10  
11 25. Defendant School District issued a directive that not only terminated Plaintiff's  
12 husband's employment but also severely restricted his movement and presence on  
13 school property even though both Plaintiff and Plaintiff's husband had previously  
14 served on the School District's Board and had a minor child attending school  
15 within the district.

16  
17 26. That upon information and belief, neither School District, defendant Steve  
18 Phillips as Superintendent, Jon Wood as principal and alleged author of the  
19 School District's "Report" or defendants Chance Moore and Bergin or defendant  
20 Ron Brown ever bothered to conduct a fair, impartial and reasonably appropriate  
21 investigation into the false allegations preferred by defendant Shannon Wood  
22 against the Plaintiff's husband.

23  
24 27. Phillips chastised friends of the Plaintiff for "liking" her comments on Facebook.

1 28. A cursory investigation under appropriate guidelines of law enforcement would  
2 have disclosed fatal flaws in both the allegations themselves and the credibility of  
3 the accuser, defendant Shannon Wood.

4  
5 29. The retaliatory misconduct of defendant Shannon Wood and Ron Brown was  
6 undertaken with the active assistance and guidance of defendant Connie  
7 McCleary in her continued efforts to dislodge the custody arrangements presently  
8 in place for her paternal minor grandchild, Keegan McCleary.

9  
10 30. This same defendant has recently pled no contest to a charge of criminal  
11 misconduct by using her Clatsop County office to create false documents to harm  
12 the Plaintiff. These charges were brought by a neighboring county (Tillamook)  
13 because it was well known that her relationship with Ron Brown insulates her  
14 from action from the Clatsop County DA's office.

15  
16 31. Upon information and belief, defendant Connie McCleary has been and may still  
17 be an employee of Clatsop County government and as such is in close contact  
18 with defendant Ron Brown and for which it is apparent the two of them have  
19 shared a professional and personal relationship for an extended period which  
20 appears to have been utilized to instigate and perpetuate the actions against  
21 Plaintiff and her husband.

22  
23 32. This same defendant has recently been charged with official misconduct in the  
24 first degree, for using her county office to create false documents to harm the  
25 Plaintiff. These charges were brought by neighboring Tillamook County because  
26 it is well known that Jane Doe's relationship with DA Ron Brown insulates her  
27



1 from action from the Clatsop County DA's office. Furthermore, Ron Brown was  
2 quoted in the Daily Astorian newspaper stating that this case was being handled  
3 by the Tillamook County DA due to his "history" with the victim (Samuelson)  
4 who is the Plaintiff.  
5

6 33. Defendant McCleary has had allegations lodged against her involving a minor  
7 child, and these allegations were determined by the Office of Training,  
8 Investigations and Safety, to be "founded" and yet the Clatsop County DA's  
9 office has refused to take action against her.  
10

11 34. The Plaintiff and her husband live in a small town and have lived in the area all of  
12 their lives –more than 60 years. They have many friends and supporters in the  
13 community. Naturally, they commiserated with their friends about the utter  
14 injustice of the situation.  
15

16 35. There was no evidence gathered, no documentation or statements of any  
17 witnesses, Ron Brown insisted on pursuing criminal charges of witness tampering  
18 against the Plaintiff, who he considered a political rival.  
19

20 36. Many people came forward from Jewell School stating that they were being  
21 threatened by the Superintendent, defendant Phillips, who fired the Plaintiff's  
22 husband. They intimidated those who even "liked" a post of the Plaintiff's on  
23 social media. In fact, they felt as if the opponents of the Plaintiff's husband were  
24 being the target of witness tampering by Steve Phillips and other defendants.  
25

26 37. Plaintiff sent a letter to the Superintendent regarding his false accusations against  
27 her.  
28

1 38. Plaintiff discussed this situation with longtime friend, Melissa Cokely ,and despite  
2 the fact that Cokley was never a witness and never had any involvement in the  
3 false charges against Plaintiff's husband, Ron Brown cited Ann's "coffee talk"  
4 with her dear friend as Witness Tampering and filed Case No. C20192778 against  
5 the Plaintiff.  
6

7 39. This subjected the Plaintiff to extreme stress, fear, embarrassment and caused her  
8 to suffer financially, emotionally and physically.

9 40. Plaintiff retained an attorney to represent her. The charges carried a three-year  
10 statute of limitations.  
11

12 41. Plaintiff eventually learned TWO YEARS after the charges against her had been  
13 dismissed, and that any evidence, specifically in the form of audio/video tapes,  
14 which would obviously have been favorable to the Plaintiff had been destroyed  
15 and disposed of. The DA's office failed to inform Plaintiff or her attorney that the  
16 charges had been dismissed.  
17

18  
19 **COUNT I**  
20 **VIOLATIONS OF 42 USC 1983**

21 Plaintiff repeats, re-allege and incorporates paragraphs 1 thru 41 as if set forth herein  
22 verbatim and further complains of all individual and representative capacity defendants herein as  
23 follows:

24 42. That the individual and representative capacity defendants engaged in a pattern  
25 and practice of conduct, under color of state law, that deprived Plaintiff of rights,  
26

27  
28 COMPLAINT 42 USC 1983, RICO, MALICIOUS PROSECUTION, ABUSE OF PROCESS, DEFAMATION OF  
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1 privileges and immunities protected under the Constitution and laws of the United  
 2 States of America in violation of 42 USC 1983.

3 43. That said deprivations consisted of but are not limited to due process violations  
 4 both substantive and procedural during the reporting, investigation and charging  
 5 which violated due process constitutional protections envisioned by the 14<sup>th</sup>  
 6 Amendment to the U.S. Constitution.  
 7

8 44. Additional constitutional deprivations occurred in the initial investigation of the  
 9 matter by Clatsop County Deputy Sheriff defendants whose constitutional  
 10 infractions were ratified by defendant Sheriff which were undertaken under color  
 11 of state law and in violation of the 14<sup>th</sup> Amendment to the U.S. Constitution.  
 12

13 45. Additional constitutional deprivations occurred in the prosecution of the  
 14 erroneously prosecuted criminal misdemeanor offenses by defendant district  
 15 attorney who knew or in the exercise of reasonable diligence would have known  
 16 that the acts of Plaintiff were statutorily protected thus immunizing her from  
 17 retaliatory prosecutions premised on mendacious and unproven assertions in  
 18 violation of 42 USC 1983 and the 14<sup>th</sup> Amendment to the US Constitution.  
 19

20 **COUNT II**  
 21 **RICO VIOLATIONS:**

22 Plaintiff repeats, re-allege and incorporates paragraphs 1 thru 45 as if set forth herein  
 23 verbatim and further complains of all individual and representative capacity defendants  
 24 herein as follows:

25 44. At all relevant times, Defendants, both named and fictitiously named, were  
 26 “persons” within the meaning of RICO 18 USC 1961(3) and 1962(c).  
 27

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1 45. At all relevant times, the defendant parties formed an association in fact for the  
2 purpose of engaging in the conduct complained of herein and this association in  
3 fact was and is an “enterprise” within the meaning of RICO 18 USC 1961(4).

4 46. At all relevant times, this enterprise comprised of the defendants herein, was  
5 engaged in, and its activities affected interstate commerce, within the meaning of  
6 RICO 18 USC 1962(c).

7 47. At all relevant times the defendants herein and others presently unknown to  
8 Plaintiff, associated with this enterprise and conducted or participated, directly or  
9 indirectly, in the conduct of the enterprise’s affairs through a “pattern of  
10 racketeering activity” within the meaning of RICO, 18 USC 1961(5) in violation  
11 of RICO, 18 USC 1962(c).

12 48. Specifically, at all relevant times, defendants and the other co-conspirators,  
13 presently unknown to Plaintiff, engaged in “racketeering activity” within the  
14 meaning of 18 USC 1961(1) by engaging in the acts set forth herein.

15 49. The acts set forth above constitute a violation of one or more of the following  
16 statutes: the state law extortion statute as set forth in RICO 18, USC 1961  
17 (1)(A); 18 USC 1341 (mail fraud); 18 USC 1343 (wire fraud); 18 USC 1344  
18 (Financial institution fraud); 18 USC 1503 (obstruction of justice); 18 USC 1513  
19 (Retaliating against a witness, victim or informant); 18 USC 1951 (interference  
20 with interstate commerce and extortion).

21 50. Defendants, through utilization of their respective offices, staff and influence,  
22 with the assistance and participation of others presently unknown to Plaintiff,  
23

1 each committed and/or aided and abetted the commission of two or more of these  
2 acts of racketeering activity.

3 51. The acts of racketeering activity referred to herein constitutes a “pattern of  
4 racketeering activity” within the meaning of RICO, 18 USC 1961(5). The acts  
5 alleged were related to each other by virtue of common participants, common  
6 victim the Plaintiff, who has been similarly prosecuted under the criminal laws of  
7 the United States in and for the District of Oregon and having a common method  
8 of commission, with the common purpose and common result of depriving  
9 Plaintiff of his liberty interest through the unconstitutional utilization of the  
10 federal criminal justice system for an alleged witness tampering premised on  
11 mendacious unproven allegations which were known to defendants to be a farce  
12 concocted and perpetrated by DA Ron Brown, and his allies, subjecting Plaintiff  
13 to violation of all aspects of his civil and constitutional rights.

14 52. The pattern of racketeering activity has continued, unabated, since its inception  
15 and is threatened to continue longer but for the institution of this action to enjoin  
16 the constitutionally impermissible conduct of the defendants herein.

17 53. The Plaintiff has been and continues to be irreparably damaged by the acts and  
18 conduct complained of herein at the hands of defendants.

19  
20  
21  
22  
23 **COUNT III**  
**RICO CONSPIRACY**

24 Plaintiff repeats and re-alleges paragraphs 1 through 53, as if fully set forth herein  
25 in full and further complains of the defendants, each and all of them, as follows:

26 54. At all relevant times, Plaintiff was a “person” within the meaning of

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1 RICO, 18 USC 1961(3) and 1964(c).

2 55. At all relevant times, defendants, each of them, were a “person” within the  
3 meaning of RICO, 18 USC 1961(3) and 1964(c).

4 56. At all relevant times, defendants had formed an association-in-fact for the purpose  
5 of engaging in the conduct complained of herein. This association-in-fact was  
6 and is, an “enterprise” within the meaning of RICO, 18 USC 1962(c).

7 57. As set forth in the paragraphs 1 through 53, defendants, each and all of them,  
8 individually and collectively, associated with this enterprise and conducted or  
9 participated, directly or indirectly, in the conduct of the enterprise’s affairs  
10 through a “pattern of racketeering activity” within the meaning of RICO, 18, USC  
11 1961(5), in violation of RICO, 18 USC 1962(c).

12 58. At all relevant times, defendants and other co-conspirators, presently unknown to  
13 Plaintiff, were each and all associated with the enterprise and agreed and conspired to  
14 violate 18 USC 1962, that is, all defendants agreed to conduct and participate, directly  
15 and/or indirectly, in the conduct of the affairs of the enterprise through a pattern of  
16 racketeering activity, in violation of 18 USC 1962(d).

17 59. Defendants and their unknown co-conspirators, committed and caused to be  
18 committed a series of overt acts in furtherance of the Conspiracy and to affect the  
19 objects thereof, including but not limited to the acts set forth above and below.

20 60. The conduct of the defendants and their unknown co-conspirators has had an adverse  
21 effect on interstate commerce and the Plaintiff has directly suffered irreparable harm  
22 and damage as the direct result and proximate cause thereof.  
23

**COUNT IV  
MALICIOUS PROSECUTION**

Plaintiff repeats and re-alleges paragraphs 1-60 as if fully set forth herein verbatim and further complains of the Defendants herein as follows:

61. Defendants initiated a criminal proceeding against the Plaintiff.

62. That defendants lacked probable cause to proceed on any purported criminal violations against the Plaintiff.

63. That the initiation of the action for purported criminal violations was done with actual malice to compel Plaintiff to acquiesce to other efforts of defendants, which Plaintiff declined to do.

64. That the criminal proceedings terminated in favor of the Plaintiff.

65. Plaintiff has been irreparably damaged by the egregious misconduct of the defendants each and all of them.

**COUNT V.  
ABUSE OF PROCESS**

Plaintiff repeats and re-alleges paragraphs 1-65 as if fully set forth herein verbatim and further complains of the Defendants herein as follows:

66. Defendants initiated a felony indictment against the Plaintiff.

67. The proceedings were instituted for the purpose of intimidating the Plaintiff from speaking about the wrongful prosecution and firing of her husband, and to assist DA Ron Brown's colleague in prevailing in another matter

68. The proceedings terminated favorably to the Plaintiff.

69. Plaintiff suffered from such egregiously extensive stress resulting directly from the

1 actions of the defendants that she had been diagnosed with PTSD from which Plaintiff  
2 continues to contend with.

3  
4 **COUNT VI**  
**INTENTIONAL INFLICTION OF MENTAL ANGUISH:**

5 Plaintiff repeats and re-alleges paragraphs 1-69 as if fully set forth herein verbatim and  
6 further complains of the Defendants herein as follows:

7  
8 70. The actions of the defendants against the Plaintiff in the filing and pursuit of the false  
9 allegations of witness tampering were undertaken intentionally or recklessly.

10 71. The actions of the defendants were extreme and outrageous and said defendants were  
11 fully aware of the extremely outrageous aspects of their mendacious misconduct.

12 72. The egregiously outrageous misconduct of the defendants were the cause of the  
13 severe emotional distress inflicted upon the Plaintiff that resulted in the loss of health,  
14 loss of income.  
15

16 **COUNT VII**  
**DEFAMATION OF CHARACTER**

17  
18 Plaintiff repeats and re-alleges paragraphs 1-72 as if fully set forth herein verbatim and  
19 further complains of the Defendants herein as follows:

20 73. Defendant Brown made and publicized false allegations against the Plaintiff.

21 74. Defendant Brown knew that the allegations were false, but defendants failed to  
22 engage in any meaningful, impartial investigation of said mendacious assertions which  
23 resulted in Plaintiff being criminally indicted and publicly humiliated.  
24

25 75. Plaintiff was damaged in her professional capacity as the owner of a real estate  
26 business, and humiliated publicly through social media and newspaper articles that  
27



1 further diminished her reputation in his community.

2 **COUNT VIII**  
3 **NEGLIGENT OVERSIGHT/TRAINING/SUPERVISION:**

4 Plaintiff repeats and re-alleges paragraphs 1-75 as if fully set forth herein verbatim and  
5 further complains of the Defendants herein as follows:

6 76. Defendants Brown and Bergin, had duties to properly train, oversee and supervise  
7 their respective employees. They also demonstrated negligent retention in supervising  
8 Sergeant Chance Moore.

9  
10 77. Each of said defendants breached their respective duties by negligently failing to  
11 train, oversee and/or supervise their respective employees.

12 78. Moreover, testimony and records will show that Sheriff Tom Bergin was out of  
13 Clatsop County more than 75% of the time from 2017 until his retirement in 2020. This  
14 supports the basis in fact of lack of supervision of employees. The letter from the DA's  
15 office dated 12/24/2019 directing the Clatsop County Sheriff's Department to destroy the  
16 digital evidence in the case of investigation of the Plaintiff was never given to the  
17 Plaintiff or her attorney when discovery was turned over. This would have been  
18 exculpatory evidence in the case against Plaintiff's husband, which was ordered to be  
19 destroyed. This constitutes a Brady violation. Destruction, spoliation, and tampering with  
20 evidence threaten the integrity of the judicial process.

21 79. That as a direct result of the failure of said defendants to properly exercise their duties  
22 and responsibilities, Plaintiff was severely damaged by said negligent failure which  
23 constitutes the proximate cause of the damages complained of herein by Plaintiff.  
24  
25  
26

1 **WHEREFORE**, Plaintiff prays for a judgment against Defendants herein as follows:

- 2 a. That process issue and Defendants be made to defend in this matter.
- 3 b. That Plaintiff be granted a judgment on Count I of the Complaint against the
- 4 Defendants in an amount not less than Five Million dollars.
- 5 c. That Plaintiff be granted a judgment on Count II of the Complaint against the
- 6 Defendants in an amount not less than Five Million dollars.
- 7 d. That Plaintiff be granted a judgment on Count III of the Complaint against the
- 8 Defendants in an amount not less than Five Million dollars.
- 9 e. That Plaintiff be granted a judgment on Count IV of the Complaint against the
- 10 Defendants in an amount not less than Five Million dollars.
- 11 f. That Plaintiff be granted a judgment on Count V of the Complaint against the
- 12 Defendants in an amount not less than Five Million dollars.
- 13 g. That Plaintiff be granted a judgment on Count VI of the Complaint against the
- 14 Defendants in an amount not less than Five Million dollars.
- 15 h. That Plaintiff be granted a judgment on Count VII of the Complaint against the
- 16 Defendants in an amount not less than Five Million dollars.
- 17 i. That Plaintiff be granted a judgment on Count VIII of the Complaint against the
- 18 Defendants in an amount not less than Five Million dollars.
- 19 j. That Plaintiff be granted the benefit of the statutory triple damage component for
- 20 Counts II and III according to law.
- 21 k. That Plaintiff be granted attorney fees and costs associated with the prosecution of
- 22 this matter.
- 23
- 24
- 25
- 26
- 27

1           1. That Plaintiff be granted all such other relief that this Court deem just and proper.

2           **PLAINTIFF DEMANDS TRIAL BY JURY OF ALL FACT ISSUES:**

3                           Dated this 6<sup>th</sup> Day of February 2023

4                                           **Respectfully submitted,**  
5                                           **LAW OFFICE OF ROBERT R. PARKER, JR., LL. B., LLC**

6                                           **/s/ Robert R. Parker, Jr.**  
7                                           **By: Robert R. Parker, Jr.**  
8                                           **OSB Number 216437**  
9                                           **Attorney for Plaintiff**